

DENNIS R. CASHMAN (SBN 133390)  
DARA L. CASHMAN (SBN 115018)  
LAW OFFICES OF DENNIS CASHMAN  
3223 Webster St.  
San Francisco, CA 94123  
Telephone: (415) 328-4715

Attorneys for Defendant Shiu Lung Leung  
aka Chao-Lung Liang and Steven Leung

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHIU LUNG LEUNG, aka CHAO-LUNG  
LIANG and STEVEN LEUNG ,

Defendant.

Case No. 09-CR-0110 SI

**DEFENDANT SHIU LUNG LEUNG'S  
UNOPPOSED APPLICATION AND  
(PROPOSED) ORDER FOR TEMPORARY  
INTERNATIONAL TRAVEL OUTSIDE  
THE NORTHERN DISTRICT OF  
CALIFORNIA**

Defendant Shiu Lung Leung hereby requests that this Court permit him to travel outside the Northern District of California, to Taoyuan County, Taiwan, to attend mother-in-law's funeral. This request is based on the following:

1. On April 16<sup>th</sup>, 2014, this court permitted Mr. Leung to travel to Taiwan to bid farewell to his mother-in-law, who had fallen into a coma and was on life support system. She was not expected to live beyond a few days after the order was signed.
2. Mr. Leung did travel to Taiwan, and was able to bid farewell to his mother-in-law, Mrs. Ho Tao-Mei Hsu, while she was in the hospital. While Mrs. Hsu was not expected to live beyond a couple of days after being taken off life support, she did not actually pass on until May 5th, 2014, (Taiwan time).

- 1 3. Mr. Leung's original travel order allowed him to stay in Taiwan until May 14<sup>th</sup>. However,  
2 due to work requirements, and school obligations for his son Jordan, Mr. Leung was forced  
3 to return to the United States on April 30<sup>th</sup>, before his mother-in-law passed on.
- 4 4. As instructed by the original travel order, Mr. Leung promptly returned his passport to  
5 Pretrial Services upon his return to the United States.
- 6 5. Now that Mrs. Hsu has expired, Mr. Leung would like to once again return to Taiwan with  
7 his son Jordan, this time to attend the funeral for his mother in law, which is scheduled for  
8 May 15th. He would return to the United States on May 18<sup>th</sup>. (which is only four days  
9 beyond the date of return set out in his original travel order, and which allows for the time  
10 difference between California and Taiwan).
- 11 6. Mr. Leung will stay at his home address, #22, Lane 3, Bai-Nian 2 Street, Longtan Township,  
12 Taoyuan County, 325 Taiwan.
- 13 7. Mr. Leung will continue to observe all other terms of his release while in Taiwan. Through  
14 counsel, he will provide the government and his Pretrial Services Officer with his detailed  
15 itinerary.
- 16 8. In order to facilitate his travel by air consistent with TSA regulations, Mr. Leung requests  
17 this Court direct Pretrial Services to temporarily return his passport to him. He will use the  
18 passport to travel to Taiwan and return to the Northern District of California only. Mr.  
19 Leung will return his passport to the custody of Pretrial Services immediately upon his  
20 return, no later than May 18<sup>th</sup> 2014, (subject only to Pretrial Services business hours).
- 21 9. Counsel has communicated with government attorney Mr. Peter Huston, and Pretrial  
22 Services Officer Alan Lew. Neither party has any objection to this travel.

1  
2 Accordingly, Mr. Leung respectfully requests that the terms of his release be temporarily  
3 modified to permit the requested travel.  
4

5 Dated: May 5<sup>th</sup>, 2014  
6  
7

8 s/ Dennis Cashman  
9 Attorney for Shiu Lung Leung  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER**

Based on the foregoing, and good cause appearing, IT IS HEREBY ORDERED that Defendant Shiu Lung Leung's conditions of release are hereby modified temporarily to permit him to travel outside of the Northern District of California consistent with the terms and conditions set forth above. Pretrial Services is directed to return Mr. Leung's passport to him or his counsel to permit Mr. Leung to travel as set forth above. Mr. Leung shall immediately return his passport to Pretrial Services when the above-described travel is complete (subject only to Pretrial Services' business hours).

IT IS SO ORDERED.

Dated: May 6, 2014



---

The Honorable Susan Illston  
United States District Judge